REMARKS

The Examiner is thanked for accepting Applicants' Request for Continuing Examination under 37 C.F.R. § 1.114, and for entering Applicants' submission filed on June 25, 2004.

By this amendment, Claims 1-2, 7-8, 14-15, 20, 23, and 25 have been amended. Dependent claims 2, 7, 15, 20, 23, and 25 have been amended to provide for the proper antecedent basis from their respective independent claims.

No claims have been added, or cancelled. Hence, Claims 1-4, 6-10, 12-17, 19-20, and 23-28 are pending in the application.

I. SUMMARY OF THE REJECTIONS

Claims 1-3, 6-10, 12-16, 19-20, and 23-28 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over U.S. Patent No. 6,012,098 to Bayeh et al. ("BAYEH") in view of U.S. Patent No. 6,589,291 issued to Boag et al. ("BOAG"), and further in view of U.S. Patent No. 6,480,860 issued to Monday ("MONDAY").

Claims 4 and 17 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over BAYEH in view of BOAG, and further in view of MONDAY and Karanjit Siyan, *NetWare TCP/IP and NFS*, New Riders Publishing 1994, pp. 11, 94, 103 ("SIYAN") which was previously cited.

II. REJECTIONS BASED ON THE CITED ART

A. CLAIMS 1 and 14

Claims 1 and 14 have been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over BAYEH in view of BOAG, and further in view of MONDAY.

Among other features, Claims 1 and 14 recite the following:

...

wherein sets of metadata are each associated with a client device type of a plurality of client device types and indicates how to convert said XML output to output for the client device type;

selecting, based on the particular client device type, a particular set of metadata from among the sets of metadata;

...

based on ~~said~~the particular set of metadata, converting the XML output to output for ~~said~~the particular client device type;

... .

Thus, Claims 1 and 14 provide for sets of metadata, where each set of metadata is associated with a client device type, and where each set of metadata indicates how to convert an XML output to output for the associated client device type. Further, Claims 1 and 14 recite the feature of selecting, based on the particular client device type of the particular client to which the output is to be sent, a particular set of metadata from among the sets of metadata. Finally, Claims 1 and 14 recite the feature of converting the XML output to output for the particular device type based on the selected particular set of metadata. The Applicants respectfully submit that none of these three features of Claims 1 and 14 is described, taught, or suggested by BAYEH, BOAG, and MONDAY, taken either alone or in combination.

1. BOAG does not describe, teach, or suggest: (a) providing sets of metadata, where each set of metadata is associated with a client device type and indicates how to convert an XML output to output for the associated client device type, and (b) selecting, based on the particular device type, a particular set of metadata from among the sets of metadata

The Office Action asserts that BAYEH does not disclose the feature of providing sets of metadata where each set is associated with a separate client device type and indicates how to convert an XML output to output for the associated client device type. The Office Action asserts, however, this feature is disclosed in BOAG, in col. 4, lines 29-36, and col. 5, lines 8-11. The Applicants respectfully disagree.

Generally, BOAG discloses techniques for "dynamically determining the most appropriate location for applying style sheets." (Abstract.) In particular, BOAG states that "[a]n object of the present invention is to provide a technique for dynamically determining the most appropriate **location** to apply style sheets, whether that location is the client device, the server, or some combination thereof." (Col. 4, lines 11-14, emphasis added.) The style sheets may be applied at the server or on a client, where "[a]pplication at the client depends on the **capabilities** of the client device." (Abstract, emphasis added.) "If the client device **cannot apply** the style sheets, then they are applied at the server, and the resulting document is sent to the client." (Id., emphasis added.) Thus, BOAG generally deals with the problem of whether a client has the **capability** to **apply** a style sheet to a set of data. BOAG, however, does not discuss or suggest in anyway providing a separate style sheet for each different client device type, where the style sheet indicates how to convert an XML output to output for the client device type. Furthermore, nothing in BOAG even suggests that the type of the client device makes any difference with regards to selecting, based on a client device type, a style sheet from among a set of style sheets associated with client device types.

In particular, while BOAG discloses one or more style sheets to apply to an input document, BOAG does not suggest in any way that the style sheets are related in any way to a client device type. Specifically, in col. 4, lines 29-36, BOAG describes that:

> The technique [for determining the most appropriate location to apply the style sheets] comprises: selecting one or more style sheets to transform a particular input document; determining whether a client device is capable of applying the selected style sheets; applying the selected style sheets at the client device when the determining has a positive result; and applying the selected style sheets at a server when the determining has a negative result.

The above paragraph at most discloses selecting one or more style sheet to apply to an input document. However, nothing in this paragraph, or for that matter in BOAG, even

suggests, let alone describes, that style sheets and their contents are in any way related to the type of the client device to which the input document is targeted.

In contrast, Claims 1 and 14 expressly recite the feature of providing sets of metadata, where each set of metadata (e.g. a style sheet) is associated with a client device type of a plurality of client device types, and where each set of metadata indicates how to convert an XML output to output for its associated client device type.

Furthermore, Claims 1 and 14 recite a feature of selecting, based on a particular client device type, a particular set of metadata from among sets of metadata that are each associated with a client device type.

In contrast, BOAG does not describe, teach, or suggest any such feature. The paragraph cited by the Office Action to allegedly support selection of style sheets based on client device type states:

> The input document may be encoded in Extensible Markup Language (XML). The style sheets may be encoded in a style sheet language such as Extensible Stylesheet Language (XSL), Cascading Style Sheet Language (CSS), or Document Style Semantics and Specification Language (DSSSL).

(BOAG, in col. 5, lines 8-11).

The Applicants respectfully submit that, at most, this paragraph describes that the input document (to which the style sheet is to be applied) can be in XML format, and that the style sheet can be in a variety of style sheet formats. Nothing in the above paragraph describes that the input document and/or the style sheet has anything to do with the type of the client device to which the document is to be sent, let alone describe or suggest that a style sheet is to be selected, based on the type of the client device, from a set of style sheets associated with client device types.

2. BOAG does not describe, teach, or suggest the feature of converting the XML output to output for the particular client device type based on the selected set of metadata

The Office Action asserts that

> it would be obvious to one with ordinary skill in the art at the time of the invention to know that Boag et al.'s invention is capable of ... **converting the XML output for said client device type**, since Boag et al further teach[es] that XML is emerging as *powerful methodology for representing document content, due to its ability to store data in a self-defining, portable manner. Style sheet languages such as XSL, along with their associated processors, are powerful tools for ... transforming documents encoded in one markup language into other markup languages such as HTML (HyperText Markup Language) or WML (Wireless Markup Language)* ([BOAG], Column 2, lines 20-28).

(Office Action, page 4, italics and boldface in the original).

The Applicants agree that BOAG, in col. 2, lines 20-28, may be describing converting XML documents by using style sheets. However, the Applicants respectfully and vehemently disagree with the Office Action assertion that the above passage renders obvious the feature in Claims 1 and 14 of converting XML output to output for a particular client device type based on a set of metadata that is associated with the particular client device type and that is selected from sets of metadata that are each associated with a client device type. Nothing in col. 2, lines 20-28 of BOAG even suggests that style sheets are in anyway associated with the client device that is to receive the XML documents, let alone teach or describe the feature in Claims 1 and 14 of converting the XML output (e.g. XML documents) to output for the client device type based on a set of metadata that has been selected based on the type of the client device.

For the reasons given above, the Applicants respectfully submit that BAYEH, BOAG and MONDAY, taken alone or in combination, fail to teach all of the elements recited in Claims 1 and 14. Thus, it is respectfully submitted that Claims 1 and 14 are patentable under 35 U.S.C. § 103(a) over BAYEH in view of BOAG, and further in view of MONDAY.

B. CLAIM 8

Claim 8 has been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over BAYEH in view of BOAG, and further in view of MONDAY. The Office Action, in page 8, states that Claim 8 "incorporates substantially similar subject matter as claim 1, and is rejected along the same rationale."

Since Claim 8 recites features that are similar to the features discussed above with respect to Claims 1 and 14, the Applicants respectfully submit that Claim 8 is patentable for the reasons given above with respect to Claims 1 and 14. Hence, withdrawal of the rejection of Claim 8 under 35 U.S.C. § 103(a) over BAYEH in view of BOAG, and further in view of MONDAY, is respectfully requested.

C. CLAIM 12

Claim 12 has been rejected under 35 U.S.C. § 103(a) as allegedly being unpatentable over BAYEH in view of BOAG, and further in view of MONDAY.

Among other features, Claim 12 recites:

> ...
> an XSL processor that converts the second output into a third output **based on an XSL style sheet associated with the type of client device** that is to receive the output; wherein the **XSL style sheet is selected based on the type of client device**.

Thus, Claim 12 includes features that are similar to the features discussed above with respect to Claims 1 and 14. In particular, Claim 12 recites that an XSL style sheet is selected based on the type of the client device and is associated with the type of the client device that is to receive the output. Further, Claims 12 recites the feature of converting a second output into a third output based on the XSL style sheet that is associated with, and selected based on, the type of the client device that is to receive the third output.

As shown above with respect to Claims 1 and 14, nothing in BAYEH, BOAG, and MONDAY, even suggests that output documents are in anyway associated with the type of the client device that is to receive the documents, let alone teach or describe a feature of converting the documents to output for the client device type based on an XSL style sheet that has been selected based on the type of the client device.

For this reason, the Applicants respectfully submit that Claim 12 is patentable under 35 U.S.C. § 103(a) over BAYEH in view of BOAG, and further in view of MONDAY.

D. DEPENDENT CLAIMS 2-4, 6-7, 9-10, 13, 15-17, 19-20, AND 23-28

Each of Claims 2-3, 6-7, 9-10, 13, 15-16, 19-20, and 23-28 is dependent upon one of independent Claims 1, 8, 12 and 14, and thus includes each and every feature of its corresponding independent claim. Each of Claims 2-3, 6-7, 9-10, 13, 15-16, 19-20, and 23-28 is therefore allowable for the reasons given above for Claims 1, 8, 12 and 14. In addition, each of Claims 2-3, 6-7, 9-10, 13, 15-16, 19-20, and 23-28 introduces one or more additional features that independently render it patentable. However, due to the fundamental differences already identified, to expedite the positive resolution of this case a separate discussion of these features is not included at this time. Therefore, it is respectfully submitted that Claims 2-3, 6-7, 9-10, 13, 15-16, 19-20, and 23-28 are allowable for the reasons given above with respect to Claims 1, 35, 41 and 75.

Claims 4 and 17 depend on independent Claims 1 and 14, respectively. Thus, each of Claims 4 and 17 includes each and every feature of its corresponding independent claims. With respect to Claims 4 and 17, the Office Action further cites SIYAN to show use of a telnet server and a telnet terminal as a type of client device. However, the Office Action does not assert, and the Applicants cannot find, that SIYAN describes any of the features of Claims 1 and 14 discussed above, which features are included in Claims 4 and 17. Thus, the Applicants

respectfully submit that, for the reasons given above with respect to Claims 1 and 14, Claims 4 and 17 are patentable under 35 U.S.C. § 103(a) over BAYEH in view of BOAG, and further in view of MONDAY and SIYAN.

III. CONCLUSION

The Applicants believe that all issues raised in the Office Action have been addressed. Further, for the reasons set forth above, the Applicants respectfully submit that allowance of the pending claims is appropriate. Reconsideration of the present application is respectfully requested in light of the amendments and remarks herein.

The Examiner is respectfully requested to contact the undersigned by telephone if it is believed that such contact would further the examination of the present application.

To the extent necessary to make this reply timely filed, the Applicant petitions for an extension of time under 37 C.F.R. § 1.136. If any applicable fee is missing or insufficient, throughout the pendency of this application, the Commissioner is hereby authorized to charge any applicable fees and to credit any overpayments to our Deposit Account No. 50-1302.

Respectfully submitted,
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